

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

CHRIS MARTIN,
Plaintiff,

v.

CLEVELAND CITY COUNCIL
PRESIDENT BLAINE GRIFFIN, *et al.*
Defendant.

Case No: 1:23-CV-2312

Judge Charles Esque Fleming

**PLAINTIFF'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE MOTION FOR
ATTORNEYS' FEES AND COSTS**

Plaintiff Chris Martin moves this Court for a seven-day extension of the deadline to file his Motion for Attorneys' Fees — from March 13, 2024 to March 20, 2024. As good cause under Fed. R. Civ. P. 6(b), Martin and his counsel are evaluating the City's most recent settlement correspondence, and additional time may help the parties' continued negotiations.

Martin's counsel requested Defendants' position on this extension request, and Defendants' counsel stated that the City does not oppose this extension request. This motion is being sought in good faith, and not for any improper purpose.

Accordingly, Plaintiff Chris Martin respectfully requests that this Court grant this Motion and extend the deadline for Plaintiff's fee petition, if necessary, until March 20, 2024.

Respectfully submitted,

/s/ Andrew Geronimo

Andrew Geronimo (#0086630)

FIRST AMENDMENT CLINIC

KRAMER LAW CLINIC CENTER

CASE WESTERN RESERVE UNIVERSITY SCHOOL OF LAW

11075 East Blvd., Cleveland, Ohio 44106

andrew.geronimo@case.edu

P: (216)-368-6855 F: (216)-368-2086

One of the attorneys for Plaintiff Chris Martin

Certificate of Service

The undersigned certifies that this Motion for Extension of Time was filed electronically on March 11, 2024 and will be served upon all parties of record by the Court's electronic case filing system.

/s/ Andrew C. Geronimo

Andrew C. Geronimo (OH #0086630)

Attorney for Plaintiff